

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

DANIEL HANCHETT, as Personal
Representative of the Estate of Shannon
Hanchett, Deceased,

Plaintiff,

v.

SHERIFF OF CLEVELAND COUNTY
IN HIS OFFICIAL CAPACITY;
TURN KEY HEALTH CLINICS, LLC,
DIANA MYLES-HENDERSON, LPC,
TARA DOTO, LPN,
NATASHA KARIUKI, LPN,

Defendants.

Case No. CV-24-87-SLP

**UNOPPOSED MOTION FOR LEAVE REQUESTING ADDITIONAL PAGES
BY DEFENDANT SHERIFF OF CLEVELAND COUNTY**

Pursuant to LCvR 7.1(e), Defendant Sheriff of Cleveland County, in his official capacity (“Defendant Sheriff”), by and through his counsel of record, respectfully moves for leave of this Court for an additional two (2) pages for Defendant Sheriff’s Motion to Dismiss. In support of this Unopposed Motion, Defendant Sheriff would show the Court as follows:

1. Pursuant to Fed. R. Civ. P. 12, Defendant Sheriff’s deadline to file his Motion to Dismiss is currently February 26, 2024.

2. Plaintiff’s Complaint contains 51 pages, 286 enumerated paragraphs. (See Doc. 001). Given the breath of Plaintiff’s Complaint, and complexity of the claims asserted, Defendant Sheriff is unable to sufficiently address those allegations and claims in the

number of pages allowed under LCvR 7.1(e).

3. Defendant Sheriff's Motion will require extensive briefing to address the whether Defendant Sheriff, in his official capacity, may be held liable for the alleged municipal failures, including alleged failures to train, supervise, and further address the alleged underlying constitutional violations.

4. While Local Rule 7.1(e) limits the brief to twenty-five (25) pages in length, to fully address the allegations and claims on behalf of Defendant Sheriff, additional pages are necessary. As such, Defendant Sheriff requests the Court to allow him up to two (2) additional pages to complete his Motion to Dismiss.

5. Therefore, Defendant Sheriff respectfully requests leave to file his brief in support of his Motion to Dismiss of no longer than twenty-seven (27) pages.

6. Undersigned counsel has conferred with Plaintiff's counsel and Plaintiff has no objection to this requested relief.

7. A proposed Order is being submitted with this Motion.

WHEREFORE, premises considered, Defendant Sheriff respectfully requests leave to file his brief in support of his Motion to Dismiss of no longer than twenty-seven (27) pages.

Respectfully submitted,

s/ Jessica L. Dark

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Attorneys for Defendant Sheriff of

Cleveland County, in his official capacity

CERTIFICATE OF SERVICE

I hereby certify that on February 21, 2024, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to all counsel who have entered their appearance in this case.

s/ Jessica L. Dark

Jessica L. Dark